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July 8, 2025

**VIA ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl St., Courtroom 14A  
New York, NY 10007

Re: *DailyPay, LLC v. James*, No. 25-CV-2849 (S.D.N.Y.)

Dear Judge Koeltl:

We write respectfully on behalf of all parties, pursuant to Section I.C. of Your Honor's Individual Practices, to request an adjournment of the initial conference scheduled for July 31, 2025 at 3:30 p.m.

Defendant's time to respond to the Complaint currently is stayed until fourteen days after a decision on the motion to remand in the action captioned *People of the State of New York v. DailyPay, Inc.*, No. 25-CV-3439 (S.D.N.Y.). *See* ECF No. 18. An adjournment of the initial conference until after responsive pleadings have been filed will promote efficiency and conserve judicial resources. This is the parties' first request for an adjournment.

We thank the Court for its consideration of this letter.

# Arnold & Porter

July 8, 2025

Page 2

Respectfully Submitted,

By: /s/ Marcus A. Asner

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